

Mr. Collings invented the V-chip in 1989 and presented his technology to the U.S. in the early 1990's. Mr. Collings' employer at the time, Simon Fraser University ("SFU"), established Canadian V-chip Design Inc. ("Canadian V-chip") to own Mr. Collings' intellectual property ("IP"). Mr. Collings and SFU are shareholders in this private company. Canadian V-chip licensed the IP to Tri-Vision in exchange for equity in Tri-Vision on condition that Mr. Collings be appointed a director. Neither Canadian V-chip nor Mr. Collings receives any royalties from V-chip licensing, and Canadian V-chip owns less than 10% of Tri-Vision. Tri-Vision has invested millions of dollars and thousands of hours to develop and promote this technology in a wide range of products

worldwide: DTV receivers, set-top boxes, portable video players and cell phones. Tri-Vision is a CEA member in good standing and exhibited the world's first flexible V-chip product at the Consumer Electronics Show (CES) in 1998.

The CEA invites interested parties to participate in standards-setting activities. Mr. Collings participates in CEA standards-setting activities as a representative of Tri-Vision. Compliance with CEA standards may require use of an invention covered by patent rights. Most patent holders file a statement of willingness to grant a license under these patent rights on reasonable and nondiscriminatory terms and conditions to applicants desiring to obtain such a license. Tri-Vision has fully disclosed its patented technology, and has submitted IP Proffers to CEA on two separate occasions including an IP Proffer (on September 14, 2000) for CEA-766-A that the CEA asked the FCC to include in its Section 15.120 rules, as well as a second IP Proffer (on June 4, 2003) for CEA-CEB-12-A "PSIP Recommended Practice". Over the past 5 years, Tri-Vision has licensed many major manufacturers for its Canadian and/or U.S. Patents, most of them CEA members, and our agreements have been based on our IP Proffer commitment of non-discrimination, fairness and reasonable royalties.

Over the past 15 years, Mr. Collings has advocated for the V-chip to the Canadian Radio-television and Telecommunications Commission, the European Union, the G7, the FCC, Asian, South American government ministries. Mr. Collings made the following disclosure in his comments to the Commission in these proceedings: "I have been involved in development and implementation of V-chip technology in North America since 1989."¹ Mr. Collings' comments to the Commission were predicated on

¹ Comments of Tim Collings in FCC 04-261 on October 7, 2003.

the assertion by the Commission that it sought on several issues including the V-chip, TV Violence, and its effect on children. Mr. Collings came forward to provide his comments regarding the implementation, the capabilities and the potential of the V-chip. In light of the very personal denunciation by CEA in their Petition, Mr. Collings should have added that he is “a parent of three young children, an engineering professor, an inventor, and a director of Tri-Vision, a public company that owns V-chip patent rights and markets the V-chip worldwide.” To avoid any unintended interpretation of flippancy in this statement, it should be made very clear that the welfare of those three children, and children like them everywhere, has been the primary and overriding force behind his efforts in this area.

We take exception to the tone of the CEA Reply Comments with regard to those who want to see the V-chip become the most useful tool it can be as the digital transition takes the industry, the medium and consumers into unknown territory. While Mr. Collings has little problem with those who would attribute ulterior motives to his technical proposals, there are a number of comments and reply comments from a number of children’s organizations. Some of these organizations include:

- Children Now
- The Center for Media Education (“CME”)
- American Academy of Pediatrics
- American Academy of Child and Adolescent Psychiatrists
- American Psychological Association
- Action Coalition for Media Education
- Mediascope

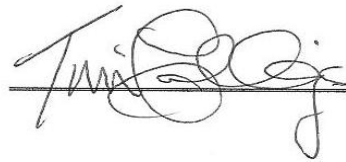
- The National Education Association
- The National PTA

CONCLUSION

The contributions of Tim Collings add a great deal to the dialogue and, during the consideration of this proceeding, we respectfully ask that the comments of Tim Collings not be dismissed lightly or ignored.

We strongly urge the Commission to reject any attempts to restrict the ability to provide parents with the necessary tools to assist them in maximizing the benefits that the digital transition has to offer.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Tim Collings', written over a horizontal line.

Timothy Collings
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A handwritten signature in black ink, appearing to read 'N.H. Siddiqui', written over a horizontal line.

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